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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

CHARLENE BYNUM individually, as the  
wife of RONALD BYNUM and as the  
Guardian of the Person and Estate of  
RONALD BYNUM,

Plaintiff,

vs.

CITY OF NORTH LAS VEGAS; JACOB  
RAY (P#1886); RODRIGO DELARA  
(P#2417); JOHN E. TONRY (P#1684); JESSE  
LEE CESENA (P#2425); ALEXANDER  
PEREZ, JEFREY K. LYTLE, CITY OF LAS  
VEGAS, et al.

Defendants.

2:17-cv-02102-APG-VPC  
Consolidated with  
Case No. 2:18-cv-00354-APG-VCF

**STIPULATION AND ORDER  
TO AMEND  
PRIOR CASE DISCOVERY PLAN  
AND  
PROPOSED  
SCHEDULING ORDER  
First Request  
(FRCP 26(f)(3) and LR 26-1(b))**

This case involves a total of 70 defendants, many of which were added by the filing of by Case No. 2:18-cv-00354-APB-VCF (02/26/18) which is now consolidated with the current matter. Plaintiff was unable to name many of the defendants until discovery had been obtained in the underlying case. The parties have propounded discovery which has been answered, one deposition has been taken. The parties anticipate there may be 20 or more depositions in this matter conducted by the plaintiffs. Also, the parties expect that at least three or more experts must be retained on both sides. In addition to additional employees of the existing defendants,

the new case adds a new employer, Correct Care Solutions, together with its employees. Neither the new employer nor its employees have answered the complaint though service has been effectuated on the employer.

Accordingly, the parties request the deadlines, for both cases, be extended by 90 days to the dates below:

Event – Original Deadlines	Deadlines	Last Day to Extend
Discovery Cut-Off June 5, 2018	Monday, September 4, 2018	Monday, August 14, 2018
Expert Disclosure Date April 5, 2018	Friday, July 6, 2018	Thursday, June 15, 2018
Rebuttal Disclosure Date May 7, 2018	Tuesday, August 7, 2018	Friday, July 13, 2018
Last Day to Amend Pleadings/ Add Parties March 6, 2018	Wednesday, June 6, 2018	Wednesday, May 16, 2018
Interim Status Report April 5, 2018	Friday, July 6, 2018	Friday, June 15, 2018
Dispositive Motions July 5, 2018	Thursday October 4, 2018	Thursday September 13, 2018
Joint Pre-Trial Order August 6, 2018	Monday, November 5, 2018	Monday, October 15, 2018

1 DATED this 21 day of March, 2018.

2 LAW OFFICE OF DAN M. WINDER, P.C.

3 /s/ Dan M. Winder  
4 DAN M. WINDER, ESQ.  
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11 *Attorneys for Plaintiff*

12 DATED this 21 day of March, 2018.

13 LEWIS BRISBOIS BISGAARE  
14 & SMITH, LLP

15 /s/ Noel E. Eidsmore  
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17 Nevada State Bar No. 3062  
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26 *Attorneys for Defendants*  
27 *City of North Las Vegas,*  
28 *Officers Jacob Ray, Rodrigo Delara, John E.*  
*Tonry, Jesse Lee Cesena,*  
*Chief Alexander Perez,*  
*and Fire Chief Jeffrey K. Lytle*

DATED this 21 day of March, 2018.

/s/ John Curtas  
BRADFORD R. JERBIC  
City Attorney  
Nevada Bar No. 1056  
By: JOHN A. CURTAS  
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*Attys for Def City of Las Vegas and Michele*  
*Freeman*

**ORDER**

IT IS SO ORDERED.

Dated this 21st day of March, 2018.

  
UNITED STATES MAGISTRATE JUDGE

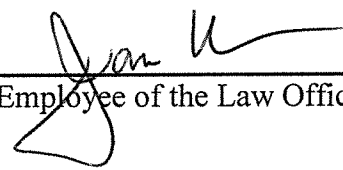
1 **CERTIFICATE OF SERVICE**

2 Pursuant to FRCP 5, LR IC 4-1, and LR 5-1, I hereby certify that I am an employee of the  
3 LAW OFFICE OF DAN M. WINDER, P.C., and that on the 21 day of <sup>March</sup>~~December~~, 2018, I  
4 served the foregoing **STIPULATION AND ORDER TO AMEND PRIOR CASE**  
5 **DISCOVERY PLAN AND PROPOSED SCHEDULING ORDER(FRCP 26(f)(3) and LR**  
6 **26-1(e))** on counsel as follows:

7  
8 E-Service pursuant to LR 5-4:

9  
10 BRADFORD R. JERBIC  
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11 By: JOHN A. CURTAS  
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15 City of Las Vegas and Michele Freeman

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20 Attorneys for Defendants  
City of North Las Vegas,  
21 Officers Jacob Ray, Rodrigo Delara,  
John E. Tonry, Jesse Lee Cesena,  
22 Chief Alexander Perez,  
and Fire Chief Jeffrey K. Lytle  
23

24  
25   
26 \_\_\_\_\_  
Employee of the Law Office of Dan M. Winder P.C.  
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